

## Initial Notification of Potential Exceptional Event Information Summary

Submitting Agency: Nevada Division of Environmental Protection, Bureau of Air Quality Planning

Agency Contact: Danilo Dragoni, Bureau Chief

Date Submitted: July 22, 2016

Applicable NAAQS: 2015 8-Hour Ozone

Affected Regulatory Decision<sup>1</sup>: Maintaining Current Attainment Status of the 2015 8-Hour Ozone NAAQS

Area Name/Designation Status: Fallon

Design Value Period: 2013-2015

Narrative: On August 18, 2015 smoke from numerous wildfires in the Northwest portion of California impacted northern Nevada. The smoke impacts contributed to exceedances of the National Ambient Air Quality Standards (NAAQS) for Ozone (O<sub>3</sub>) within Washoe County Health District monitoring network and one site within NDEP's monitoring network. The NDEP requests that the Regional Administrator for Region IX of the U.S. Environmental Protection Agency (EPA) accepts this Initial Notification so that an Exceptional Events Demonstration package can be prepared to petition for the exclusion of the air quality monitoring data effected by these fires from the normal planning and regulatory requirements under the Clean Air Act (CAA) in accordance with the Exceptional Events Rule (EER).

The NDEP believes that this request should be granted independently from the effect that the reported exceedances may have on the single monitor design values and any related regulatory actions. In particular:

1. The draft *Guidance on the Preparation of Exceptional Events Demonstrations for Wildfire Events that May Influence Ozone Concentration* released by USEPA in November 2015 clearly relies on the difference between O<sub>3</sub> concentrations during event and non-event periods as one of the criteria to identify exceptional events (at least for tier 1 and 2 approaches). The NDEP firmly believes that such distinction cannot be limited to the comparison between events that have and events that don't have effect on design values.
2. As expressed in the comments to the proposed Rule on *Treatment of Data Influenced by Exceptional Events* by the Western States Air Resources Council (and joined by the NDEP), "[...] **there may be other compelling reasons why states would want EPA action on an exceptional event demonstration, including exceedances that may contribute to a violating design value in a future year; exceedances that may impact modeling or statistical analyses; exceptional event demonstrations that use historical data comparisons; and to address public perception of air quality in a region.**

**WESTAR urges EPA to not limit demonstrations to just the five types of regulatory actions [...]"**

3. The wildfire event that generated the reported exceedances was a regional event, and the NDEP concurred with one other air agency in Nevada (Washoe County Health District) about submitting a related Initial Notification and a subsequent Exceptional Events Demonstration. In this case, the event is affecting the design value for Washoe County. Therefore, even though the NDEP believes that this should not be a discriminating factor, the event described in this NDEP Initial Notification has a regulatory impact for the state of Nevada and, paraphrasing the proposed Exceptional Event rule, relates *to treatment of data showing exceedances or violations of the O<sub>3</sub> air quality standard for the purpose of an action to designate an area pursuant to CAA*.

**Table A:**

Information specific to each flagged site day that may be submitted to EPA in support of the affected regulatory decision listed above.

Date(s) of Event	NAAQS Standard	Type of Event (high wind, volcano, wildfires/prescribed burns, other <sup>2</sup> )	AQS Flag	Site AQS ID	POC	Site Name	Monitor Concentration
08/20/2015	Ozone	Northwest Wildfires	RT	32-001-0002	1	Fallon	0.076ppm
08/21/2015	Ozone	Northwest Wildfires	RT	32-001-0002	1	Fallon	0.080ppm

**Table B:**

Violating Sites Information for 8-Hour Ozone (listing of all violating sites<sup>3</sup> in the planning area, regardless of operating agency, and regardless of whether or not they are affected by EEs)

Site (AQS ID)	Design Value ( <u>without</u> EPA concurrence on all events listed in Table A above)	Design Value ( <u>with</u> EPA concurrence on all events listed in Table A above)
Fallon (32-001-0002)	65	64

**Table C:**

Summary of Maximum Design Value (DV) Site Information for 8-Hour Ozone (Effect of EPA Concurrence on Maximum Design Value Site Determination)

Maximum DV site (AQS ID) <b><u>without</u> EPA concurrence</b> on any of the events listed in Table A above	Design Value 65	Design Value Site Fallon (32-001-0002)	Comment
Maximum DV site (AQS ID) <b><u>with</u> EPA concurrence</b> on all events listed in Table A above	Design Value 64	Design Value Site Fallon (32-001-0002)	Comment

**Table D:**

Site(s) with Invalid Ozone Design Values

Site Name (AQS ID)	Parameter(s)	Reason for Invalid Design Value(s)	Comments
none	n/a	n/a	n/a

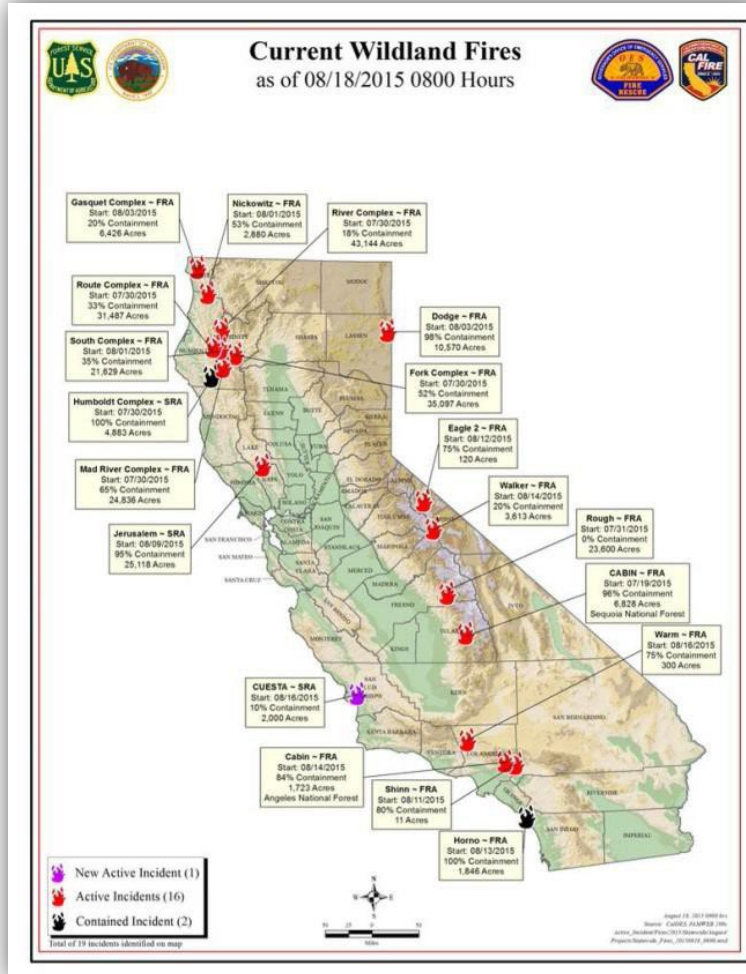
<sup>1</sup> designation, classification, attainment determination, attainment date extension, or finding of SIP inadequacy leading to SIP call

<sup>2</sup> Provide additional information for types of event described as "other"

<sup>3</sup> Note if violating monitor is a near-road monitor

## Supporting Images:

Aqua Satellite Image of the Northwest Fires from 8/21/2016



## HMS Smoke layers for 8/21/2016

